

## **REMARKS**

Claim 21 is amended to specify that the first and second release sheets are in contact with the first and second surfaces respectively of the layer of solid electro-optic medium. Basis for these amendments is found, *inter alia*, in Figure 3 and Paragraph [0130] of the specification. This Paragraph states that one or both of the adhesive layers 308 and 312 may be omitted from the double release film shown in Figure 3. Omitting both adhesive layers 308 and 312 necessarily produces a structure in which the first and second release sheets 310 and 314 respectively are in contact with the first and second surfaces of the layer 304 of solid electro-optic medium, as now specified in claim 21.

Claims 17-27 and 33-44 are pending in this application. All claims stand rejected under 35 USC 102(e) as anticipated by LeCain et al., U.S. Patent Publication No. 2004/0027327. This rejection is traversed on the grounds that LeCain does not anticipate any of the present claims.

The discussion below requires reference to several differ multi-layer structures, and it is believed that this discussion will be more easily understood by abbreviating the various layers involved as follows:

LTS - light-transmissive substrate

ECL - electrically-conductive layer

EOL - layer of solid electro-optic medium

AL - adhesive layer

RS - release sheet.

In the paragraph bridging pages 2 and 3 of the Office Action, with regard to claim 17 it is stated (and applicants agree) that Figures 1-3 and Paragraphs 0113-0114 of LeCain show an article of manufacture having the structure EOL (16)/AL (26)/RS (28), but do not specifically disclose a second adhesive layer on the second surface of the EOL (i.e., on the opposed side thereof from the first adhesive layer). The Office Action further states that LeCain does disclose that a second layer of adhesive could be applied

[to the] opposed side of the electro-optic medium from the layer first applied, and refers to Paragraph 0102.

With respect, Paragraph 0102 of LeCain refers to a completely different structure from that shown in Figures 1-3 thereof. The "front plane laminate" shown in Figures 1-3 has the following structure:

LTS (12)/ECL (14)/EOL (16)/AL (26)/RS (28).

Furthermore, as described in Paragraphs 0112-0114 of LeCain, this front plane laminate is prepared by depositing the electro-optic medium on a film comprising the light-transmissive substrate and the electrically-conductive layer (see the first sentence of Paragraph 0113), coating the layer of lamination adhesive 26 over the layer of electro-optic medium (see the first sentence of Paragraph 0114), and covering the layer of lamination adhesive with a release sheet.

Paragraph 0102 of LeCain describes a completely different structure and process from that shown in Figures 1-3. In Paragraph 0102, a layer of electro-optic medium is formed on a release sheet and then an adhesive layer is formed over the electro-optic medium to produce the structure:

RS/EOL/AL.

This structure can then be used to attach the electro-optic layer to an object via the adhesive layer. Paragraph 0102 further states that "a second layer of adhesive could be applied on the opposed side of the electro-optic medium from the layer first applied, thereby converting the electro-optic medium into a double-sided adhesive film which could be laminated, for example, to a backplane on one side and to an electrode on the other." The only way in which such a second layer of adhesive could be applied would be to peel the release sheet from the RS/EOL/AL, thus producing an AL/EOL/AL structure.

There is no suggestion in LeCain of any similar procedure for providing a second adhesive layer in the structure of Figures 1-3. This is not surprising, since there is in fact no way of effecting a parallel procedure on the front plane laminate shown in Figures 1-3 of LeCain, in which there is no peelable layer present on the opposed side of

the electro-optic layer from the adhesive layer 26; the electrically-conductive layer 14, being (typically) a metal oxide layer is not peelable from the electro-optic layer. Accordingly, it is not possible to remove the layers on the opposed side of the electro-optic layer from the (first) adhesive layer 26 and expose the surface of the electro-optic layer to form a second adhesive layer thereon. Hence, LeCain does not anticipate present claim 17.

The rejection of claim 20 in the last complete paragraph on page 3 of the Office Action is not understood. Firstly, as should be apparent from the description of Figure 10 at Paragraphs 0139-0142 of LeCain, the structure illustrated in Figure 13 is not a front plane laminate similar to that shown in Figures 1-3, but is a complete electro-optic display; note that there is no release sheet 28 in Figure 13. Secondly and more importantly, it is respectfully noted that in LeCain's Figure 13 the layer 412 is not an adhesive layer at all but rather a protective sheet (see the first sentence of Paragraph 0151).

The undersigned attorney assumes that the paragraph bridging pages 3 and 4 of the Office Action was intended to be a rejection of claim 21, not claim 20. On this assumption, this rejection is traversed on the grounds that it is readily apparent that LeCain does not describe any structure as now defined in claim 21 with the two release sheets in contact with the surfaces of the electro-optic medium; in the parts of LeCain referred to in this rejection, there is an adhesive layer between the electro-optic medium and one release sheet, and at least an electrically-conductive layer, a light-transmissive layer and a second adhesive layer between the electro-optic medium and the second release sheet.

The rejection of claim 23 is traversed for the same reasons as the rejection of claim 17 discussed above. Claim 23 is essentially directed to a process for using the double release film of claim 17 in a double lamination process to form a display, and as already discussed LeCain does not describe the formation of the double release film of claim 17, and hence cannot describe the process of claim 23.

*Duthaler et al.*  
*Serial No. 10/605,024*  
*Amendment of December 18, 2006*  
*Page 9*

Since for the foregoing reasons, LeCain does not anticipate any of the independent claims 17, 21 and 23 present in this application, all claims of this application are patentable over LeCain.

Reconsideration and allowance of all claims in this application is respectfully requested.

Since the normal period for responding to the Office Action expired October 27, a Petition for a two month extension of this period is filed herewith.

Respectfully submitted  
/David J. Cole/  
David J. Cole  
Registration No. 29629

E INK Corporation  
733 Concord Avenue  
Cambridge MA 02138

Telephone (617) 499-6069  
Fax (617) 499-6200  
E-mail dcole@eink.com